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5  
6 *Attorneys for Defendants Meta Platforms, Inc.*  
*f/k/a Facebook, Inc.; Facebook Holdings, LLC;*  
*Facebook Operations, LLC; Meta Payments Inc.*  
*f/k/a Facebook Payments Inc.; Meta Platforms*  
*Technologies, LLC f/k/a Facebook Technologies,*  
*LLC; Instagram, LLC; and Siculus LLC f/k/a*  
9 *Siculus, Inc.*

10  
11 UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 OAKLAND DIVISION

14  
15 IN RE: SOCIAL MEDIA ADOLESCENT  
16 ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

17 This Document Relates To:

18 *ALL ACTIONS*

19 MDL No. 3047

20 Case No.: 4:22-md-03047-YGR

21 **DECLARATION OF ASHLEY M.  
SIMONSEN IN SUPPORT OF  
DEFENDANTS' MOTION TO EXCLUDE  
TESTIMONY OF SCHOOL DISTRICT  
EXPERTS**

22 Judge: Hon. Yvonne Gonzalez Rogers  
23 Magistrate Judge: Hon. Peter H. Kang

**DECLARATION OF ASHLEY M. SIMONSEN**

I, Ashley M. Simonsen, declare as follows:

I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the May 16, 2025 Expert Report of Dr. Sharon Hoover.

2. Attached hereto as **Exhibit 2** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Breathitt County Board of Education.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Charleston County School District.

4. Attached hereto as **Exhibit 4** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for DeKalb County School District.

5. Attached hereto as **Exhibit 5** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Board of Education Harford County.

6. Attached hereto as **Exhibit 6** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Irvington Public Schools.

7. Attached hereto as **Exhibit 7** is a true and correct copy of the June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Tucson Unified School District.

8. Attached hereto as **Exhibit 8** is a true and correct copy of the August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Breathitt County.

9. Attached hereto as **Exhibit 9** is a true and correct copy of the August 1, 2025 Rebuttal Report of Dr. Sharon Hoover for Charleston County School District.

10. Attached hereto as **Exhibit 10** is a true and correct copy of the August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for DeKalb County School District.

1       11. Attached hereto as **Exhibit 11** is a true and correct copy of the August 1, 2025 Rebuttal  
2 Report of Dr. Sharon Hoover for Harford County Public Schools.

3       12. Attached hereto as **Exhibit 12** is a true and correct copy of the August 7, 2025 Amended  
4 Rebuttal Report of Dr. Sharon Hoover for Irvington Public Schools.

5       13. Attached hereto as **Exhibit 13** is a true and correct copy of the August 7, 2025 Amended  
6 Rebuttal Report of Dr. Sharon Hoover for Tucson Unified School District.

7       14. Attached hereto as **Exhibit 14** is a true and correct copy of the May 18, 2025 Expert Report  
8 of Robert Klein for Breathitt County School District.

9       15. Attached hereto as **Exhibit 15** is a true and correct copy of May 18, 2025 Expert Report of  
10 Robert Klein for Charleston County School District.

11       16. Attached hereto as **Exhibit 16** is a true and correct copy of May 18, 2025 Expert Report of  
12 Robert Klein for DeKalb County School District.

13       17. Attached hereto as **Exhibit 17** is a true and correct copy of May 18, 2025 Expert Report of  
14 Robert Klein for Harford County Public Schools.

15       18. Attached hereto as **Exhibit 18** is a true and correct copy of May 18, 2025 Expert Report of  
16 Robert Klein for Irvington Public Schools.

17       19. Attached hereto as **Exhibit 19** is a true and correct copy of May 18, 2025 Expert Report of  
18 Robert Klein for Tucson Unified School District.

19       20. Attached hereto as **Exhibit 20** is a true and correct copy of the August 1, 2025 Rebuttal  
20 Report of Robert Klein for Breathitt County School District.

21       21. Attached hereto as **Exhibit 21** is a true and correct copy of the August 1, 2025 Rebuttal  
22 Report of Robert Klein for Charleston County School District.

23       22. Attached hereto as **Exhibit 22** is a true and correct copy of the August 1, 2025 Rebuttal  
24 Report of Robert Klein for DeKalb County School District.

25       23. Attached hereto as **Exhibit 23** is a true and correct copy of the August 1, 2025 Rebuttal  
26 Report of Robert Klein for Harford County Public Schools.

27       24. Attached hereto as **Exhibit 24** is a true and correct copy of the August 1, 2025 Rebuttal  
28 Report of Robert Klein for Irvington Public Schools.

1       25. Attached hereto as **Exhibit 25** is a true and correct copy of the August 1, 2025 Rebuttal  
2 Report of Robert Klein for Tucson Unified School District.

3       26. Attached hereto as **Exhibit 26** is a true and correct copy of the June 20, 2025 Amended  
4 Expert Report of Dr. Douglas Leslie for Breathitt County Board of Education.

5       27. Attached hereto as **Exhibit 27** is a true and correct copy of the June 20, 2025 Amended  
6 Expert Report of Dr. Douglas Leslie for Charleston County School District.

7       28. Attached hereto as **Exhibit 28** is a true and correct copy of the June 20, 2025 Amended  
8 Expert Report of Dr. Douglas Leslie for DeKalb County School District.

9       29. Attached hereto as **Exhibit 29** is a true and correct copy of the June 20, 2025 Amended  
10 Expert Report of Dr. Douglas Leslie for Board of Education Harford County.

11       30. Attached hereto as **Exhibit 30** is a true and correct copy of the June 20, 2025 Amended  
12 Expert Report of Dr. Douglas Leslie for Irvington Public Schools.

13       31. Attached hereto as **Exhibit 31** is a true and correct copy of the June 20, 2025 Amended  
14 Expert Report of Dr. Douglas Leslie for Tucson Unified School District.

15       32. Attached hereto as **Exhibit 32** is a true and correct copy of the August 1, 2025 Rebuttal  
16 Report of Dr. Douglas Leslie for Breathitt County Board of Education.

17       33. Attached hereto as **Exhibit 33** is a true and correct copy of the August 1, 2025 Rebuttal  
18 Report of Dr. Douglas Leslie for Charleston County Board of Education.

19       34. Attached hereto as **Exhibit 34** is a true and correct copy of the August 1, 2025 Rebuttal  
20 Report of Dr. Douglas Leslie for DeKalb County School District.

21       35. Attached hereto as **Exhibit 35** is a true and correct copy of the August 1, 2025 Rebuttal  
22 Report of Dr. Douglas Leslie for Board of Education Harford County.

23       36. Attached hereto as **Exhibit 36** is a true and correct copy of the August 1, 2025 Rebuttal  
24 Report of Dr. Douglas Leslie for Irvington Public Schools.

25       37. Attached hereto as **Exhibit 37** is a true and correct copy of the August 1, 2025 Rebuttal  
26 Report of Dr. Douglas Leslie for Tucson Unified School District.

27       38. Attached hereto as **Exhibit 38** is a true and correct copy of the May 19, 2025 Expert Report  
28 of Jeffrey Meyers for Breathitt County Board of Education.

1       39. Attached hereto as **Exhibit 39** is a true and correct copy of the May 19, 2025 Expert Report  
2 of Jeffrey Meyers for Charleston County Board of Education.

3       40. Attached hereto as **Exhibit 40** is a true and correct copy of the May 19, 2025 Expert Report  
4 of Jeffrey Meyers for DeKalb County School District.

5       41. Attached hereto as **Exhibit 41** is a true and correct copy of the May 19, 2025 Expert Report  
6 of Jeffrey Meyers for Board of Education of Harford County.

7       42. Attached hereto as **Exhibit 42** is a true and correct copy of the May 19, 2025 Expert Report  
8 of Jeffrey Meyers for Irvington Public Schools.

9       43. Attached hereto as **Exhibit 43** is a true and correct copy of the May 19, 2025 Expert Report  
10 of Jeffrey Meyers for Tucson Unified School District.

11       44. Attached hereto as **Exhibit 44** is a true and correct copy of the July 25, 2025 Expert Reply  
12 Report of Jeffrey Meyers for Breathitt County Board of Education.

13       45. Attached hereto as **Exhibit 45** is a true and correct copy of the July 25, 2025 Expert Reply  
14 Report of Jeffrey Meyers for Charleston County Board of Education.

15       46. Attached hereto as **Exhibit 46** is a true and correct copy of the July 25, 2025 Expert Reply  
16 Report of Jeffrey Meyers for DeKalb County School District.

17       47. Attached hereto as **Exhibit 47** is a true and correct copy of the July 25, 2025 Expert Reply  
18 Report of Jeffrey Meyers for Board of Education of Harford County.

19       48. Attached hereto as **Exhibit 48** is a true and correct copy of the July 25, 2025 Expert Reply  
20 Report of Jeffrey Meyers for Irvington Public Schools.

21       49. Attached hereto as **Exhibit 49** is a true and correct copy of the July 25, 2025 Expert Reply  
22 Report of Jeffrey Meyers for Tucson Unified School District.

23       50. Attached hereto as **Exhibit 50** is a true and correct copy of the May 16, 2025 Expert Report  
24 of Dr. Brian Osborne.

25       51. Attached hereto as **Exhibit 51** is a true and correct copy of the July 30, 2025 Expert Report  
26 of Dr. Brian Osborne.

27       52. Attached hereto as **Exhibit 52** is a true and correct copy of the May 19, 2025 Expert Report  
28 of Dr. Bryce Ward for Breathitt County Schools.

1       53. Attached hereto as **Exhibit 53** is a true and correct copy of the May 19, 2025 Expert Report  
2 of Dr. Bryce Ward for Charleston County School District.

3       54. Attached hereto as **Exhibit 54** is a true and correct copy of the May 19, 2025 Expert Report  
4 of Dr. Bryce Ward for DeKalb County School District.

5       55. Attached hereto as **Exhibit 55** is a true and correct copy of the May 19, 2025 Expert Report  
6 of Dr. Bryce Ward for Harford County Public Schools.

7       56. Attached hereto as **Exhibit 56** is a true and correct copy of the May 19, 2025 Expert Report  
8 of Dr. Bryce Ward for Irvington Public Schools.

9       57. Attached hereto as **Exhibit 57** is a true and correct copy of the May 19, 2025 Expert Report  
10 of Dr. Bryce Ward for Tucson Unified School District.

11       58. Attached hereto as **Exhibit 58** is a true and correct copy of the July 31, 2025 Expert Reply  
12 Report of Dr. Bryce Ward for Breathitt County Schools.

13       59. Attached hereto as **Exhibit 59** is a true and correct copy of the July 31, 2025 Expert Reply  
14 Report of Dr. Bryce Ward for Charleston County School District.

15       60. Attached hereto as **Exhibit 60** is a true and correct copy of the July 31, 2025 Expert Reply  
16 Report of Dr. Bryce Ward for DeKalb County School District.

17       61. Attached hereto as **Exhibit 61** is a true and correct copy of the July 31, 2025 Expert Reply  
18 Report of Dr. Bryce Ward for Harford County Public Schools.

19       62. Attached hereto as **Exhibit 62** is a true and correct copy of the July 31, 2025 Expert Reply  
20 Report of Dr. Bryce Ward for Irvington Public Schools.

21       63. Attached hereto as **Exhibit 63** is a true and correct copy of the July 31, 2025 Expert Reply  
22 Report of Dr. Bryce Ward for Tucson Unified School District.

23       64. Attached hereto as **Exhibit 64** is a true and correct copy of Volume 1 of Dr. Sharon  
24 Hoover's Deposition, taken August 12, 2025.

25       65. Attached hereto as **Exhibit 65** is a true and correct copy of Volume 2 of Dr. Sharon  
26 Hoover's deposition, taken August 13, 2025.

27       66. Attached hereto as **Exhibit 66** is a true and correct copy of the September 5, 2025  
28 deposition of Robert Klein.

1       67. Attached hereto as **Exhibit 67** is a true and correct copy of the August 27, 2025 deposition  
 2 of Dr. Douglas Leslie.

3       68. Attached hereto as **Exhibit 68** is a true and correct copy of the August 22, 2025 deposition  
 4 of Jeffrey Meyers.

5       69. Attached hereto as **Exhibit 69** is a true and correct copy of the September 4, 2025  
 6 deposition of Dr. Brian Osborne.

7       70. Attached hereto as **Exhibit 70** is a true and correct copy of the August 15, 2025 deposition  
 8 of Dr. Bryce Ward.

9       71. Attached hereto as **Exhibit 71** is a true and correct copy of the Materials Considered List  
 10 (Exhibit B) to Dr. Brian Osborne's May 16, 2025 Expert Report.

11       72. Attached hereto as **Exhibit 72** is a true and correct copy of the Federal Judicial Center's  
 12 *Reference Guide on Survey Research*, 359 FED. JUDICIAL CTR. & NAT'L ACADEMIES PRESS (3rd ed. 2011).

13       73. Attached hereto as **Exhibit 73** is a true and correct copy of the paper *Improving the Quality*  
 14 *of Retrospective Reports: Calendar Interviewing Methodologies*, Program in Survey Research &  
 15 Methodology (Working Paper No. 12), authored by Robert F. Belli.

16       74. Attached hereto as **Exhibit 74** is a true and correct copy of the article *Evaluating Survey*  
 17 *Quality in Today's Complex Environment*, AM. ASS'N FOR PUB. OPINION RESEARCH (2016), authored by  
 18 Reg Baker and others.

19       75. Attached hereto as **Exhibit 75** is a true and correct copy of the article *School Counselor*  
 20 *Roles & Ratios* (2025), authored by the American School Counselor Association.

21       76. Attached hereto as **Exhibit 76** is a true and correct copy of the SHAPE District Profile for  
 22 Breathitt County Schools (2019), authored by the National Center for Mental Health.

23       77. Attached hereto as **Exhibit 77** is a true and correct copy of the SHAPE District Profile for  
 24 DeKalb County School District (2019), authored by the National Center for Mental Health.

25       78. Attached hereto as **Exhibit 78** is a true and correct copy of DeKalb County School  
 26 District's Third Amended Plaintiff Fact Sheet.

27       79. Attached hereto as **Exhibit 79** is a true and correct copy of the July 30, 2025 Rebuttal  
 28 Report of Dr. Sharon Hoover.

1       80. Attached hereto as **Exhibit 80** is a true and correct copy of a June 6, 2025 thread involving  
 2 Melissa Yeates, Joseph Sandoval-Bushur, and others.

3       81. Attached hereto as **Exhibit 81** is a true and correct copy of cited excerpts of Julia  
 4 Shivandona's April 8, 2025 Rule 30(b)(6) deposition.

5       82. Attached hereto as **Exhibit 82** is a true and correct copy of the webpage Common Core of  
 6 Data – America’s Public Schools (2023 – 2024), issued by the National Center for Education Statistics.

7       83. Attached hereto as **Exhibit 83** is a true and correct copy of *The Professional Standards of*  
 8 *the National Association of School Psychologists* (2019), authored by the National Association of School  
 9 Psychologists.

10      84. Attached hereto as **Exhibit 84** is a true and correct copy of the May 2, 2025 Affidavit of  
 11 Daphne Noble.

12      85. Attached hereto as **Exhibit 85** is a true and correct copy of the May 13, 2025 Affidavit of  
 13 Dr. April Vauss.

14      86. Attached hereto as **Exhibit 86** is a true and correct copy of the May 15, 2025 Affidavit of  
 15 Lisa Allison.

16      87. Attached hereto as **Exhibit 87** is a true and correct copy of the May 16, 2025 Affidavit of  
 17 Monika Davis.

18      88. Attached hereto as **Exhibit 88** is a true and correct copy of the May 5, 2025 Affidavit of  
 19 Phillip Watts.

20      89. Attached hereto as **Exhibit 89** is a true and correct copy of the May 13, 2025 Declaration  
 21 of Holly Hammel.

22      90. Attached hereto as **Exhibit 90** is a true and correct copy of Plaintiff Board of Education of  
 23 Harford County’s Amended Responses and Objections to Defendants’ Interrogatories (Set 3), dated April  
 24 14, 2025.

25      91. Attached hereto as **Exhibit 91** is a true and correct copy of cited excerpts of the May 7,  
 26 2025 deposition of Bernard Hennigan.

27      92. Attached hereto as **Exhibit 92** is a true and correct copy of cited excerpts of the May 16,  
 28 2025 Rule 30(b)(6) deposition of Dr. April Vauss.

93. Attached hereto as **Exhibit 93** is a true and correct copy of cited excerpts of the June 30, 2025 deposition of Julie Shivandona.

94. Attached hereto as **Exhibit 94** is a true and correct copy of cited excerpts of the Rule 30(b)(6) deposition of Andrew Moore.

95. Attached hereto as **Exhibit 95** is a true and correct copy of cited excerpts of the Rule 30(b)(6) deposition of Robert Ross.

96. Attached hereto as **Exhibit 96** is a true and correct copy of cited excerpts of the May 23, 2025 deposition of Sabrina Salmon.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and accurate.

DATED: September 30, 2025

By: /s/ Ashley M. Simonsen

Ashley M. Simonsen